

The Examiner has rejected claims 1, 2, 6, 9, and 13 under 35 U.S.C. 102(e) as being anticipated by Rietkerk (U.S. patent 5,748,083). The Applicant respectfully traverses this rejection. Rietkerk neither teaches nor implies a rule base that is associated with the appliance being protected. The Examiner refers to column 4, lines 23-29; column 5, lines 42-53; and Figs. 1A, 1B, and 2 of Rietkerk as referring to such a rule base. The referenced text entries of Rietkerk refer to the ability of the wireless receiver 103 to distinguish an alarm transmission (a one-shot transmission) from a tamper transmission (a repetitive transmission). Rietkerk does not discuss appliance-specific rules for determining the appropriate alarm response, if any, that the alarm activation processor should take in response to these received transmissions, as specifically claimed in each of the Applicant's independent claims 1, 6, 9, and 13.

Because Rietkerk neither teaches nor suggests a rule base associated with each appliance, as specifically claimed by the Applicant, the Applicant respectfully requests the Examiner's reconsideration of the rejection of claims 1, 2, 6, 9, and 13 under 35 U.S.C. 102(e) as being anticipated by Rietkerk.

The Examiner has rejected claims 3, 4, 7, 8, 10, and 11 under 35 U.S.C. 103(a) as being unpatentable over Rietkerk in view of Hall et al (U.S. patent 5,898,831). The Applicant respectfully traverses this rejection. The Applicant respectfully suggests that the Examiner is using hindsight reconstruction to arrive at the Applicant's claimed invention. The Examiner notes that Rietkerk does not disclose the use of respective HAVi and Home API compliant modules for the status reporter and alarm activation processor, but asserts that because Hall's security system includes home and office systems that are interfaced to work with each other, one of ordinary skill in the art would have been lead to the use of HAVi and Home API compliant modules, as specifically claimed by the Applicant.

Hall specifically teaches a custom-designed dynamically configurable personal area network that is specifically structured to overcome perceived problems associated with conventional networks. Many of the conventional network characteristics noted by Hall as being disadvantageous are common to HAVi and Home API networks. To

overcome these disadvantages, Hall proposes a needs-based and proximity-based network architecture. Hall's network configuration is based upon a need vs. capabilities match among peer devices that are in proximity with each other (column 3, lines 41-65). Each node in Hall's network is free to create its own personal area network, based on its needs and the capabilities of other nodes within its vicinity (column 3, lines 45-51). With specific regard to a security network, because the network is structured based on proximity, rather than a conventional logical association, the individual devices are free to decide whether or not to participate as a member of the proximity network (column 13, lines 42-65), and thereby whether or not to participate in the security network. In view of the expressed teachings of Hall against conventional networks and in favor of a network architecture that is dynamic, voluntary, and needs-capabilities based, one of ordinary skill in the art would not be lead to incorporate the teachings of Rietkerk into a conventional network architecture, such as HAVi and Home-API. Neither Rietkerk nor Hall, collectively or individually, teach or suggest the use of HAVi or Home-API compliant modules for status reporting and alarm activation, as specifically claimed by the Applicants.

Because Rietkerk is silent with regard to the use of a HAVi or Home-API module as the status reporter and alarm activation processor, and Hall eschews the use of conventional network architectures, the Applicant respectfully requests the Examiner's reconsideration of the rejection of claims 3, 4, 7, 8, 10, and 11 under 35 U.S.C. 103(a) as being unpatentable over Rietkerk in view of Hall et al.

The Examiner has also rejected claims rejected claims 3, 4, 7, 8, 10, and 11 under 35 U.S.C. 103(a) as being unpatentable over Rietkerk in view of Le Van Suu (U.S. patent 5,714,933). The Applicant respectfully traverses this rejection with regard to claims 3, 4, 7, 8, 10, and 11, for the reasons given above, noting that Le Van Suu neither teaches nor suggests a HAVi or Home-API compliant module for status reporting and alarm activation.

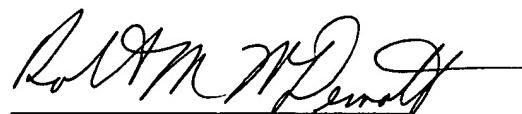
The subsequent paragraph on page 4 of the referenced Office Action after the above cited rejection of claims 3, 4, 7, 8, 10, and 11, addresses claims 5 and 12 of the Applicant's invention, and discusses the area security elements of claims 5 and 12. The

Applicant assumes that the introductory paragraph was meant to read claims 5 and 12, in lieu of "claims 3, 4, 7, 8, 10, and 11". To advance prosecution, the Applicant herein addresses the Examiner's remarks regarding claims 5 and 12 in view of Le Van Suu.

As noted above, each of the Applicant's claims include the limitation that the alarm activation is dependent upon a rule base that is associated with the appliance. Neither Rietkerk nor Le Van Suu, collectively or independently, teach or suggest the use of appliance-specific rules for determining an alarm response to a communicated status of the appliance.

Based on the arguments presented above, the Applicant respectfully requests the Examiner's reconsideration of each rejection, and the subsequent allowance of claims 1-16 of the subject application.

Respectfully submitted,



Robert M. McDermott, Esq.

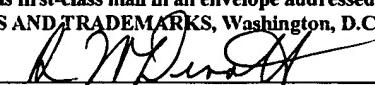
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On 1 December 1999

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